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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MAR 21 1986

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Command Herbicide - Estuarine and Marine Testing

TO: Douglas D. Campt, Director  
Registration Division (TS-767-C)

The Ecological Effects Branch, Hazard Evaluation Division, has reviewed FMC's request for extension of the time allotted to repeat two estuarine/marine acute studies on Command herbicide. We do not feel that the time constraints originally placed on FMC (to have the two studies redone and submitted by April 7, 1986) were unreasonable. However, we will concur with the request for extension.

*Anne Benter*  
for John W. Melone, Director  
Hazard Evaluation Division (TS-769-C)

cc: J. Akerman  
M. Slimak  
R. Taylor

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FEB 24 1986

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Command Marine and Estuarine Testing

FROM: Douglas Campt, Director  
Registration Division

TO: John Melone, Director  
Hazard Evaluation Division

Registration Division is completing the registration tolerance actions for FMC's new herbicide Command. We appreciated the recent expedited reviews by your Ecological Effects Branch on several of the aquatic studies.

In the review (copy attached) two of the estuarine/marine studies were determined to be invalid. One of the conditions Ecological Effects Branch demanded was a April 7, 1986 completion for these studies. Registration Division has informed FMC the two studies need to be repeated and have received, in writing, a commitment to do the studies.

The studies will utilize mysid shrimp and sheepshead minnow. The studies will be submitted in 4 months (June 5, 1986). This date goes beyond the April 7th date in the EEB memo, but the date is the best the company could do given the limited number of facilities available to do such studies and their earlier experiences with submitting studies that the Agency determines to be invalid. Battelle - New England Marine Research Laboratory has been authorized to do the studies.

Please let me know if you or your staff wants to discuss this matter.

cc: J. Akerman  
R. Taylor (PM-25)  
M. Slimak

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28 JAN 1986

MEMORANDUM

SUBJECT: Command herbicide - data gaps

FROM: Allen W. Vaughan, Entomologist  
Ecological Effects Branch  
Hazard Evaluation Division (TS-769-C)

THRU: Norman J. Cook, Head-Section #2  
Ecological Effects Branch  
Hazard Evaluation Division (TS-769-C)

THRU: Michael W. Slimak, Chief  
Ecological Effects Branch  
Hazard Evaluation Division (TS-769-C)

TO: James Akerman, Chief  
Herbicide Fungicide Branch  
Registration Division (TS-767-C)

EEB has been instructed by Steven Schatzow to relay the following information to RD.

Conditional registration of Command herbicide for use on soybeans is acceptable under the following conditions:

1. FMC must have the two invalid estuarine/marine acute studies redone and have the data submitted within a time-frame acceptable to EEB. We have determined that the data must be submitted no later than April 7, 1986.
2. The LC50 values from both tests must be such that no potential for hazard to estuarine organisms is indicated, based on the aquatic EEC. Specifically, LC50 values must be greater than 5 ppb.

Failure to meet either of the above conditions will result in automatic cancellation of the conditional registration for Command herbicide.

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**FMC Corporation**

Agricultural Chemical Group  
2000 Market Street  
Philadelphia Pennsylvania 19103  
215 299 6000

February 5, 1986



Mr. James Akerman  
Deputy Division Director  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division (TS-767C)  
Crystal Mall, Building 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Dear Mr. Akerman:

Subject: Command Herbicide  
Pesticide Petition No. 4F3128  
Command Technical  
EPA File Symbol 279-GNLE  
Command 4 EC Herbicide  
EPA File Symbol 279-GNLG  
Command 6 EC Herbicide  
EPA File Symbol 279-GNLU

FMC Corporation agrees to repeat the acute LC50 marine and estuarine organism studies to support the registration of the proposed Command Herbicide products. As we agreed, the studies will utilize Mysid shrimp and the fathead minnow as the test organisms. Battelle-New England Marine Research Laboratory has been authorized to conduct these studies on our behalf. Final reports will be submitted to the Agency in four months.

Sincerely,

A handwritten signature in cursive script, reading 'Eunice M. Cuirle'.

Eunice M. Cuirle  
Registration Specialist

cc: J.J. Lauber

FEB - 5 1986

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